

REMARKS

Favorable reconsideration of this application in view of the foregoing amendments and remarks to follow is respectfully requested.

Claims 1-20 are pending in this application. By this response, Claims 1, 5, 9 and 11 have been amended. Support for these amendments can be found, for example, in FIGS. 1C and 1D, as well as paragraph 0053 of the originally filed application. Applicants do not acquiesce in the correctness of the rejections and reserve the right to present specific arguments regarding any rejected claims not specifically addressed. Furthermore, Applicants reserve the right to pursue the full scope of the subject matter of the original claims in a subsequent patent application that claims priority to the instant application. Reconsideration in view of the following remarks is respectfully requested.

In the Office Action, Claims 1-3, 5-9 and 11-14 are rejected under 35 U.S.C. §102(e) as allegedly anticipated by Gau (U.S. Pat. No. 6,949,440). Concerning this rejection, Applicants submit that Gau does not anticipate the claims of the present application because Gau fails to disclose each and every element of the claimed invention. In particular, and with respect to amended independent Claims 1 and 9, Applicants submit that Gau fails to disclose, *inter alia*, “wherein the outer well regions and the inner well region are in contact with the subcollector.” (See Claim 1, and as similarly recited by Claim 9.) Assuming, *arguendo*, that Gau discloses outer well regions 44 and 52, as asserted by the Office, Fig. 11 of Gau clearly shows outer region 52 extending only partially into substrate 40. However, outer region 52 does not contact subcollector 42. In contrast, and in the claimed invention, the well regions 20A, 20B and 20C extend down to the surface of the n⁺ subcollector 14, as is depicted, for example, in FIG. 1C. Gau, however, fails to disclose this claimed feature. Therefore, Applicants submit that Gau fails

to disclose each and every element of the claimed invention and respectfully request withdrawal of the rejection under 35 U.S.C. §102(e).

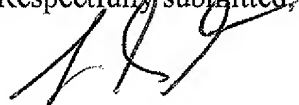
With respect to Claims 5 and 11, Applicants submit that Gau does not anticipate the claims of the present application because Gau fails to disclose each and every element of the claimed invention. Specifically, with respect to Claims 5 and 11, Applicants submit that Gau fails to disclose, *inter alia*, "...wherein each inner well region and each outer well region extends beneath the isolation region to the subcollector such that neighboring outer and inner well regions are in contact with each other along the entire depth of each well region beneath the isolation region." (See claim 5, and as similarly recited by claim 11.) Instead, Gau discloses neighboring wells that are separated by portions of the substrate. FIG. 11 of Gau shows wells 44, 46 and 48 that are each separated from each other by substrate 40 and isolation regions 50. As each well in Gau extends beneath isolation region 50 towards buried N-type doping region 42, the thickness of substrate 40 between each well increases. Accordingly, Gau clearly fails to disclose, *inter alia*, neighboring well regions that are in contact with each other along the entire depth of each well region beneath the isolation region. Therefore, Applicants submit that Gau fails to disclose each and every element of the claimed invention and respectfully request withdrawal of the rejection under 35 U.S.C. §102(e).

With respect to dependent Claims 2-4, 6-8 and 12-14, Applicants herein incorporate the arguments presented above with respect to the independent claims from which the claims depend. The dependent claims are allowable based on the above arguments, as well as for their own additional features.

In light of the above, Applicants respectfully submit that all claims are in condition for allowance. Should the Examiner require anything further to place the application in better

condition for allowance, the Examiner is invited to contact Applicants' undersigned representative at the number listed below.

Respectfully submitted,

A handwritten signature in black ink, appearing to read 'LSZ', is written over the closing text.

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